

SILVERMAN | ATTORNEYS
& ASSOCIATES | AT LAW

January 26, 2024

VIA ECF AND FACSIMILE: (914) 390-4179

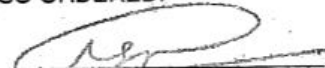
Honorable Nelson S. Roman
United States District Court
Southern District of New York
300 Quarropas Street
White Plains, New York 10601

Defendants' request for an extension of time is GRANTED. Pre-motion letter(s) seeking to file summary judgment motion(s) shall be filed by Feb. 29, 2024, and response(s) thereto shall be filed by Mar. 5, 2024. Alternatively, if settlement is reached, the parties shall notify the Court in writing by Feb. 29, 2024. The Court further adjourns *sine die* the status teleconference scheduled for Feb. 16, 2024. The Clerk of the Court is directed to terminate the motion at ECF No. 76.

Re: O'Connell v. Town of Bedford Police Department, et al.
Docket No.: 21 CV 00170 (NSR)
Our File No.: 1020. 107

Dated: January 30, 2024
White Plains, NY

SO ORDERED:


HON. NELSON S. ROMAN
UNITED STATES DISTRICT JUDGE

Dear Judge Roman:

We represent the Defendants in this matter and are writing, with the consent of Plaintiff's Counsel, to respectfully request a one-month extension of time to file a summary judgment pre-motion letter from January 31, 2024 to February 29, 2024, and to adjourn the telephonic pre-motion conference scheduled for February 16, 2024 to a date that is convenient for the Court.

We are making this request because the parties made considerable progress towards a resolution of this matter during a settlement conference with Magistrate Judge Krause on January 5, 2024. Although an agreement was not reached at the conference, the parties have continued to discuss resolution options within a proposed framework. The parties are continuing to explore the possibility of resolution, some of which involves discussion with non-parties, to ensure that the proposed framework is viable. We are continuing our discussions and all parties believe that the additional time requested will allow the parties to determine if the case can be resolved within the proposed framework.

Based on the above, we respectfully request a one-month extension of time to file a summary judgment pre-motion letter from January 31, 2024 to February 29, 2024. We also respectfully request an adjournment of the telephonic pre-motion conference scheduled for February 16, 2024 to a date that is convenient for the Court after February 29, 2024.

Thank you for your consideration of this matter.

Respectfully yours,

SILVERMAN & ASSOCIATES


Lewis R. Silverman

cc: **Via ECF and Email**
All Counsel of Record

USDC SDNY
DOCUMENT
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DOC #: _____
DATE FILED: **01/30/2024**